

**U.S. DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

ERIC BERNARD (#R-25398), a/k/a TERRELL KING,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF CORRECTIONS and
WEXFORD HEALTH SOURCES, INC.,

Defendants.

No. 20cv50412

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

ERIC BERNARD (#R-25398), a/k/a TERRELL KING,

Plaintiff,

v.

ROB JEFFRIES, ANDREA TACK, SONJA
NICKLAUS, JOHN VARGA, ANN GRANGER,
WEXFORD HEALTH SOURCES, INC., MONICA
CARPENTER, CELIA GROSSMAN, LACI BARLO,
UNKNOWN IDOC OFFICIALS and UNKNOWN
MEDICAL STAFF DEFENDANTS,

Defendants.

No. 20cv50413

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

JOINT STATUS REPORT

1. On January 30, 2025, the parties convened for a Court status hearing, during which the status of discovery was discussed on the record. Case 20-cv-50412, Dkt. #185; Case No. 20-cv-50413, Dkt. #221. At this time, the parties discussed prospective expert discovery, and the Court directed the parties meet and confer to discuss a proposed expert discovery schedule.

2. On February 10, 2025, through February 12, 2025, the parties conferred via email regarding scheduling and deadlines for expert discovery: the parties propose the following schedule for expert discovery:

- a. Plaintiff's expert report shall be due by April 14, 2025
- b. Plaintiff's expert shall be deposed by May 14, 2025
- c. Defense expert reports shall be due by July 13, 2025
- d. Defense experts shall be deposed by August 12, 2025
- e. Plaintiff's rebuttal reports shall be due by September 11, 2025.
- f. Defense counsel additionally proposes that their rebuttal reports shall be due by October 13, 2025. Plaintiff's counsel opposes this proposal.

Respectfully submitted,

CASSIDAY SCHADE, LLP

By: /s/ Joseph M. Ranvestel

One of the Attorneys for Defendants,
WEXFORD HEALTH SOURCES, INC.,
CECILIA GROSSMAN, LACI BARLOW, DR.
MELISSA YOUNG, AMI WATSON, AND
DR. MIRELLA SUSNJAR

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/s/ Maria Makar (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2024, I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/Joseph M. Ranvestel

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